

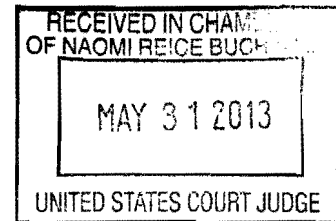
MEMO ENDORSED

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U.S. Department of JusticeUnited States Attorney
Southern District of New York

USDC SDNY
DOCUMENT
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The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 30, 2013



The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Rajarengan Rajaratnam, 13 Cr. 211 (NRB)

Dear Judge Buchwald:

The Government writes to update the Court on the status of this case and to request, jointly with the defense, that the Court adjourn for approximately 45 days the conference that is scheduled in this case for June 4, 2013, as well as the discovery deadline of June 4, 2013.

In order to facilitate plea discussions with the defense, soon after the defendant was arraigned in March 2013, the Government provided a binder of key wiretap transcripts, summaries of trading records, and other significant evidence to the defense. Thereafter, the parties' counsel met at the U.S. Attorney's Office to discuss the possible resolution of the case short of trial. The parties agree that it would be very helpful to have additional time for these discussions before the next conference and before full discovery is produced. For these reasons, the parties jointly request that the Court adjourn the conference date and the discovery deadline for approximately 45 days.

With the consent of the defense, the Government further requests that time be excluded through the date of the next conference under the Speedy Trial Act. The Government makes this request to permit the defendant and the Government to continue discussions that may lead to the resolution of this case before trial, to permit the defense additional time to review the targeted discovery that the Government has provided to date, and to permit the Government additional

The
conference
is adjourned
until
July 30,
2013 at

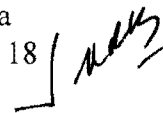
3 o'clock pm.

Naomi Reice
Buchwald,
USDC
6/3/13

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time to prepare full discovery, which will be voluminous. The ends of justice served by such a continuance outweigh the best interests of the public and the defendants in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A). 

Respectfully submitted,

PREET BHARARA
United States Attorney

By: 

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cc: David C. Tobin, Esq.
Vino Varghese, Esq.